

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW MEXICO**

<b>IN RE:</b>	)	<b>In Proceedings Under Chapter 7</b>
	)	
<b>NANCY AKBARI-SHAHMIRZADI</b>	)	<b>Case No. 11—15351-T7</b>
<b>(SSN: #XXX-XX-3176)</b>	)	
	)	
<b>Debtor.</b>	)	

**DEBTOR’S MOTION TO CONVERT CASE**

**COMES NOW**, Debtor Nancy Akbari-Shahmirzadi (“Akbari”), by and through counsel of record Tal Young, P.C. (Steven Tal Young, Esq.) and The Law Offices of Ron Holmes (Ronald E. Homes, Esq.) and moves this Court for an order as follows:

1. Akbari requested relief pursuant to Chapter 7 of the United States Bankruptcy Code on December 14, 2011.
2. Akbari seeks to convert this case to a case under Chapter 11 pursuant to Bankruptcy Code § 706.

WHEREFORE, for the reasons stated, and for other good and valuable reasons presented at any hearing on this matter, Akbari moves this Court for an order converting this case and for such other further relief the Court deems just in the premises.

Respectfully Submitted,

**TAL YOUNG, P.C.**  
**A Professional Corporation**

By: s/ submitted electronically  
**STEVEN TAL YOUNG**  
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I HEREBY CERTIFY that on the 21st day of June, 2013, I filed the foregoing *electronically* through the CM/ECF system which caused the following Parties or counsel to be served by electronic means (or by other means), as more fully reflected on the Notice of Electronic Filing:

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s/ Steven Tal Young, Esq.  
**STEVEN TAL YOUNG**